

03/18/83

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
CAROLINA POWER AND LIGHT COMPANY)
NORTH CAROLINA EASTERN MUNICIPAL)
POWER AGENCY)
(Shearon Harris Nuclear Power Plant)
Units 1 and 2)

Docket Nos. 50-400-OL
50-401-OL

NRC STAFF INTERROGATORIES TO
RICHARD D. WILSON

The NRC Staff hereby requires the Intervenor, Richard D. Wilson pursuant to 10 C.F.R. § 2.740b, to answer separately and fully, in writing and under oath or affirmation, the following interrogatories on or before April 6, 1983.

GENERAL INTERROGATORIES FOR EACH CONTENTION

Provide for each of your contentions numbered I, III, and IVC, including each subpart, the following information.

INTERROGATORY 1

Set forth in detail all of your education and experience that qualifies you to make the allegations set forth in each of your contentions.

INTERROGATORY 2

Set forth all calculations and analysis made by you or on your behalf in support of your contention.

DESIGNATED ORIGINAL

Certified By 

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SPECIFIC INTERROGATORIES

INTERROGATORY 3

Describe the extent and environmental impacts of chlorine emitted from the Harris facility which have been inadequately addressed in the Applicants Environmental Report.

INTERROGATORY 4

Identify the test or historical data that supports your allegation that unassessed adverse effects resulting from chlorine will exist as a result of the operation of Harris.

CONTENTION I(b)

INTERROGATORY 5

Set forth the test or historical data or analysis that supports your allegation that chlorine disbursed from the cooling tower may be toxic to the surrounding biosphere.

INTERROGATORY 6

Describe in units of conventional measurement the physical extent of the biosphere that you allege may be adversely affected in Contention I(a).

INTERROGATORY 7

Identify by genus, species, and concentration, the biological entities that inhabit the biosphere you reference in Contention I(b).

INTERROGATORY 8

Define in meaningful quantitative terms, not simply that chlororganic components are formed in chlorinated cooling water, the types and amounts of chlororganic compounds which you allege will be disbursed in cooling tower evaporation. You should identify the power levels and time periods which are parameters of your assertions.

CONTENTION I(c)

INTERROGATORY 9

Describe in quantitative measures the amount of sulphuric acid which you allege may be released to the biosphere through the cooling tower evaporation at the Harris facility. Your reply should indicate the power levels and time periods encompassed in your reply so that it is meaningful.

INTERROGATORY 10

Identify all biological entities by genus and species that will inhabit the biosphere alleged by you to be toxic which will be adversely affected by sulphuric acid disbursed through the Harris cooling tower.

INTERROGATORY 11

Quantify the adverse environmental impacts upon the biological entities identified by you in response to Interrogatory I(c).

CONTENTION I(d)

INTERROGATORY 12

Identify each "other chemical" or chemical compound which you allege could be toxic to the biosphere.

INTERROGATORY 13

Identify each biological entity that would be adversely affected by the "other chemicals" you allege could be toxic in your contention I(d).

INTERROGATORY 14

Quantify the adverse effects of "other chemicals" upon biological entities in the biosphere.

CONTENTION I(e)

INTERROGATORY 15

Define the physical area that constitutes the "biosphere" in your contention.

INTERROGATORY 16

Identify the biological entities that will be adversely affected by disbursing Cape Fear River water to the atmosphere.

INTERROGATORY 17

Quantify the amount of Cape Fear River water that will be disbursed to the atmosphere through cooling towers at Harris and set forth the parameters, assumptions and methodology by which you devise your reply.

INTERROGATORY 18

Identify the industrial wastes by composition, quantity, and discharge^r, in the Cape Fear River that you allege will be disbursed from the Harris cooling tower to the atmosphere.

INTERROGATORY 19

Since you are located in Apex, NC about 10 miles from the proposed facility in the NE quarter quadrant downwind from Harris 04% of the time, (E.R. Fig. 2.3 6-7), describe in quantitative terms, how the industrial waste from the Cape Fear River will adversely effect your interests and quantify the amount that will so adversely effect you.

CONTENTION I(f1) and I(f2)

INTERROGATORY 20

Provide the factual and analytical basis which supports your assertion that the applicants' estimates of the flow of the Buckhorn Creek cannot approximate the flow of the Middle Creek.

INTERROGATORY 21

Set forth by school, course description and general description of subject matter, all academic courses you have taken in hydrology and/or soil mechanics which would qualify you as an expert to challenge the applicants assumption that the flow in the Buckhorn Creek may be synthesized from the flow in the Middle Creek.

INTERROGATORY 22

Set forth any work experience that would qualify you to dispute the applicants assumption that the flow in the Buckhorn Creek may be synthesized from the flow in the Middle Creek.

INTERROGATORY 23

What is the size of the watershed of the Buckhorn Creek and what is the source of your reply.

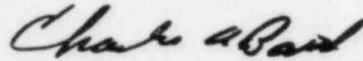
INTERROGATORY 24

What is the size of the watershed of the Middle Creek and what is the source of your reply.

INTERROGATORY 25

Set forth all of the applicants false assumptions, other than that the Buckhorn Creek and Middle Creek watersheds have the same rainfall, that you allege to exist in your contention 1(f).

Sincerely yours,



Charles A. Barth
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 18th day of March, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER AND LIGHT COMPANY AND
NORTH CAROLINA EASTERN MUNICIPAL
POWER AGENCY

(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-400 OL
50-401 OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF INTERROGATORIES TO RICHARD D. WILSON", "NRC STAFF INTERROGATORIES TO WELLS EDDLEMAN", "NRC STAFF REQUEST FOR ADMISSION TO WELLS EDDLEMAN" and "NRC STAFF INTERROGATORIES TO JOINT INTERVENORS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 18th day of March, 1983.

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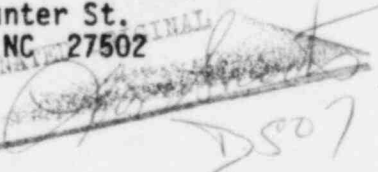
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges:
James P. Gleason, Chairman
Frederick J. Shon
Dr. Oscar H. Paris

OFFICE OF RECORDS
AND A SEPARATE
BRANCH

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In the Matter of)	Docket Nos.
)	50-247 SP
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point, Unit No. 2))	50-286 SP
)	March 14, 1983
POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point, Unit No. 3))	

-----x

LICENSEES' MOTION FOR WAIVER
OF EXHIBIT DISTRIBUTION

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DS03

Preliminary Statement

Consolidated Edison Company of New York, Inc. ("Con Edison"), licensee of Indian Point Station Unit No. 2, and the Power Authority of the State of New York ("Power Authority"), licensee of Indian Point 3 Nuclear Power Plant (collectively the "licensees"), hereby move for an order waiving the requirement of 10 CFR § 2.743(f) for distribution of copies to each party of the draft document entitled "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone," November, 1981 (the "methodology document").

Request for Waiver

10 CFR § 2.743(f) requires a party to furnish each other party with a copy of any written exhibit offered into evidence, unless "the presiding officer directs otherwise." In connection with the testimony to be presented by the licensees' off-site emergency planning panel (Parsons Brinckerhoff Quade & Douglas, Inc. witnesses), we presently intend to offer the methodology document into evidence as an exhibit.

The methodology document is quite voluminous, totaling several hundred pages. The furnishing of a copy for each party would be extremely expensive and does not appear

to be necessary. A waiver of § 2.743(f) is appropriate for these reasons. The licensees further note that this document was produced for all parties at licensees' document production on June 1, 1982, and has in fact been marked for identification in this proceeding as UCS/NYPIRG Exhibit 1.

In lieu of now furnishing a copy to each party, the licensees propose to furnish one copy to each Board member, to the reporter, and to each table of parties when the off-site panel is presented. In addition, the licensees would make a copy available for inspection by appointment at the offices of counsel to the Power Authority, Shea & Gould, New York, New York.

Respectfully submitted,

Brent L. Brandenburg
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Dated: March 17, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
James P. Gleason, Chairman
Frederick J. Shon
Dr. Oscar H. Paris

In the Matter of)
) Docket Nos.
)
CONSOLIDATED EDISON COMPANY OF NEW YORK,) 50-247 SP
INC. (Indian Point, Unit No. 2)) 50-286 SP
)
POWER AUTHORITY OF THE STATE OF NEW YORK) March 17, 1983
(Indian Point, Unit No. 3))
)

CERTIFICATE OF SERVICE

I hereby certify that copies of LICENSEES' MOTION FOR WAIVER OF EXHIBIT DISTRIBUTION in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 17th day of March, 1983.

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